

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

[PROPOSED] ORDER GRANTING MOTION TO SEAL

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to File Documents Under Seal (Dkt. 291) seeking to seal certain materials submitted to the Court in connection with Plaintiffs' Motion Seeking Relief For Google's Failure To Obey Discovery Order ("Motion Seeking Relief") (Dkt. 292). Having considered the motion to seal, supporting declarations, and pleadings on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed		Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Motion Seeking (Dkt. 291-2)	g Relief	GRANTED as to redacted portions at: Page 1 Lines 6-11 Page 2 Lines 25-27 Page 3 Lines 1-4, 21-22 Page 5 Lines 17, 23 Page 8 Lines 3-5 Page 9 Lines 11, 16 Page 10 Lines 9-11 Page 11 Lines 14-17 Page 12 Lines 1, 11, 13 Page 14 Lines 17, 19, 22-27 Page 15 Lines 1-10	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, and information contained in those logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

- 1			
1	Exhibit E to the Declaration	GRANTED as to redacted	Narrowly tailored to protect
2	of Erika Nyborg-Burch in	portions at:	confidential technical information
2	support of the Motion Seeking Relief (Dkt. 291-7)	Pages 1-2.	regarding the operation of Google's products and systems, including the
3	Seeking Renei (Drt. 291-7)		various types of Google's internal
4			identifiers/cookies and their proprietary functions that Google
5			maintains as confidential in the
6			ordinary course of its business and is not generally known to the public or
7			Google's competitors.
′	Exhibit F to the Declaration	GRANTED as to the	Narrowly tailored to protect
8	of Erika Nyborg-Burch in	document in its entirety	confidential technical information
9	support of the Motion Seeking Relief (Dkt. 291-8)		regarding highly sensitive features of Google's operations and consumer
	Beeking Rener (DRt. 251 0)		data, including Google's internal
10			data storage infrastructure, that
11			Google maintains as confidential in
12			the ordinary course of its business and is not generally known to the
			public or Google's competitors.
13	Exhibit H to the Declaration	GRANTED as to redacted	Narrowly tailored to protect
14	of Erika Nyborg-Burch in support of the Motion	portions at:	confidential technical information
15	Seeking Relief (Dkt. 291-9)	Pages 2, 4	regarding the operation of Google's products and systems, including the
13	<i>B</i> • • (· · · · · ·)	,	various types of Google's internal
16			identifiers/cookies and their
17			proprietary functions, the various types of logs maintained by Google,
10			that Google maintains as
18			confidential in the ordinary course of
19			its business and is not generally
20			known to the public or Google's competitors.
	Exhibit I to the Declaration	GRANTED as to redacted	Narrowly tailored to protect
21	of Erika Nyborg-Burch in	portions at:	confidential technical information
22	support of the Motion Seeking Relief (Dkt. 291-	Page 2	regarding the operation of Google's products and systems, including the
23	10)	1 100 2	various types of Google's internal
			identifiers/cookies and their
24			proprietary functions, the various types of logs maintained by Google,
25			that Google maintains as
26			confidential in the ordinary course of
			its business and is not generally
27			known to the public or Google's competitors.

1	Exhibit J to the Declaration	GRANTED as to the	Narrowly tailored to protect
$_{2}$	of Erika Nyborg-Burch in	document in its entirety	confidential technical information
	support of the Motion Seeking Relief (Dkt. 291-		regarding the operation of Google's products and systems, including the
3	11)		various types of Google's internal
4			identifiers/cookies and their
5			proprietary functions, that Google
3			maintains as confidential in the ordinary course of its business and is
6			not generally known to the public or
7			Google's competitors.
	Exhibit K to the Declaration	GRANTED as to redacted	Narrowly tailored to protect (1) confidential technical information
8	of Erika Nyborg-Burch in support of the Motion	portions at:	regarding the operation of Google's
9	Seeking Relief (Dkt. 291-	Pages 1-3, 5-12	products and systems, including the
10	12)		various types of Google's internal
			identifiers/cookies and their proprietary functions, the various
11			types of databases maintained by
12			Google, that Google maintains as
13			confidential in the ordinary course of its business and is not generally
			known to the public or Google's
14			competitors and (2) Plaintiffs'
15	E-hibit L to the Deslamation	CDANTED 4 14-1	sensitive information.
16	Exhibit L to the Declaration of Erika Nyborg-Burch in	GRANTED as to redacted portions at:	Narrowly tailored to protect (1) confidential technical information
	support of the Motion	r	regarding the operation of Google's
17	Seeking Relief (Dkt. 291-	Pages 2-9	products and systems, including the
18	13)		various types of Google's internal identifiers/cookies and their
19			proprietary functions, the various
			types of databases maintained by
20			Google, that Google maintains as confidential in the ordinary course of
21			its business and is not generally
22			known to the public or Google's
			competitors and (2) Plaintiffs' sensitive information.
23			sensitive information.
24	SO ORDERED.		
25	SO ORDERED.		
26	DATED:		
		ТНЕ НО	NORABLE SUSAN VAN KEULEN
27		United St	tates Magistrate Judge
28			